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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

June 9, 2017

BY ECF

The Honorable Valerie E. Caproni United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Joseph Percoco, et al., S1 16 Cr. 776 (VEC)

Dear Judge Caproni:

The Government respectfully writes in response to the Court's April 10, 2017 Order requiring the Government to update the Court monthly with regard to the status of discovery.

Since the Government's discovery status letter dated May 12, 2017, we have produced approximately 99,899 pages of documents, including approximately 14,458 pages of documents released by relevant counsel after initially having withheld such documents as potentially privileged. At present, the Government is processing for production approximately 12,078 pages of additional documents obtained in the course of the Government's ongoing investigation. The Government anticipates that those documents will be made available to the defense in or about early July 2017. The Government will continue to process and produce promptly additional documents it may obtain in the course of its investigation.

Respectfully submitted,

JOON H. KIM Acting United States Attorney

By: /s/ David Zhou

Janis Echenberg/Robert Boone/ David Zhou/Matthew Podolsky Assistant United States Attorneys (212) 637-2597/2208/2438/1947

cc: Counsel for all defendants (via ECF)